

October 12, 2018

**VIA EMAIL and U.S. MAIL**

Ms. Kim Claussen  
King County Department of Permitting and Environmental Review  
35030 SE Douglas Street, Suite 210  
Snoqualmie, WA 98065-9266  
Kimberly.claussen@kingcounty.gov

Re: Preliminary Plat Application No. PLAT18-0007 (Gunshy Manor)

Dear Ms. Claussen:

We represent the Estate of Barbara J. Nelson and the WCN GST Non-Exempt Marital Trust #2 (collectively, "Nelson Estate"), the owner of Gunshy Manor Farm ("Gunshy Farm"), which is the property that is the subject of the above-referenced preliminary plat application.

This letter responds to the letter dated July 17, 2018, sent to King County DPER by various individuals opposed to any development of Gunshy Farm. The opposition letter asks DPER to "unilaterally suspend" its work on the application. For the reasons explained below, the letter provides no basis for DPER to do so.

First, the opposition letter offers no actual evidence or data to support its assertions of contamination. Instead, the letter relies on speculation and rumors, which do not constitute actual information sufficient to require either reporting or a remedial investigation under MTCA or CERCLA or a basis for DPER to suspend its work on the plat application.

Second, many of the allegations in the opposition letter are based on inaccurate information or fundamental misunderstandings of the proposed development:

- The letter states that (b) (6) drank the water from an aquifer at Gunshy Farm and implies that, as a consequence, he died of cancer. That implication is baseless. Most of the time that (b) (6) worked on the Farm he drank the same water that the Nelson family drank, clean water from a hillside spring. For the remainder of the time that he worked on the Farm, he lived in a doublewide manufactured home on the western part of the property, where he drank clean water from the Union Hill Water Association's supply to the public.

- A statement attached to the letter as Exhibit “A” makes vague allegations that homes are proposed to be developed in the center of the property.<sup>1</sup> However, no homes are proposed there.
- The opposition letter alleges that the development is planned in a landslide hazard area. That allegation is false. Although a mapped landslide hazard area lies in roughly the south half of the property, none of the proposed lots are proposed in the south half of the property.<sup>2</sup>

Third, environmental sampling data establishes that the water at Gunshy Farm is clean and safe to drink. There are no facts from which DPER could or should conclude that there is environmental contamination at the Farm or that the proposed development is at risk of a landslide.

#### **I. The Nelson Family and Gunshy Manor Farm**

Bill and Barbara Nelson owned Gunshy Farm for many decades, where they lived and raised their (b) (6). The Nelson family drank water from the Farm’s hillside spring for decades with no adverse health impacts. This is the same water that the Farm’s employees drank and that the Nelsons’ horses drank. The water was and still is safe to drink as explained further in Section IV below.

Bill and Barbara were successful business owners. One of their successful businesses was Gunshy’s Thoroughbred breeding program, which spanned over 50 years (Ex. 1, Washington Thoroughbred Breeders Racing Hall of Fame). Gunshy Farm was one of Washington’s most successful Thoroughbred and Polled Hereford breeding farms. In particular, Gunshy was known for the exceptional blood line of their Thoroughbred race horses. In 2014, both Bill and Barbara were inducted into the Washington Racing Hall of Fame in recognition for their superior breeding program. (Ex. 1). Their success and honors were achieved because they produced healthy horses with a superior bloodline. The opposition letter’s unsupported, speculative allegations that their horses were unhealthy are false.

Bill and Barbara Nelson were also successful in their other businesses as well. Both were University of Washington graduates. Barbara became only the second woman in UW history to be elected class president and was also editor of the UW paper, *The Daily*. After attending the UW, Bill received his MBA from Harvard University. After obtaining his MBA, Bill had a

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<sup>1</sup> “There was a huge flat field at Gunshy right at the center of the place and where the new proposed development has homes that went unused for ever. [sic]” Opposition letter, Exhibit A, (b) (6) Statement.

<sup>2</sup> Opposition letter at 5-6. The landslide hazard area allegation stems from the (b) (6) declaration, Opposition letter at Ex. F. Although both (b) (6) property and the property south of hers, which she references, are located in a mapped King County Potential Landslide Area, none of the proposed Gunshy Manor lots are located in a Landslide Hazard Area. See, in relation to the submitted proposed layout of lots on the Gunshy Manor preliminary plat site plan, the Landslide Hazard Areas Map, Figure 5, that is part of the April 26, 2018 *Subsurface Exploration, Geologic Hazard, and Geotechnical Engineering Report* prepared by Associated Earth Sciences, Inc. for the Gunshy Manor Residential Subdivision.



successful career in insurance and bonding as CEO and President of Dawson & Company, Inc., an insurance brokerage firm. Bill specialized in construction insurance at a time when the insurance industry was focusing heavily on exposure to liability from environmental contamination due to the passage of CERCLA<sup>3</sup> in 1980. He was also involved in commercial and retail property development and leasing and received countless awards, including the Redmond Chamber of Commerce Business Excellence Continuing Achievement Award.

There is no evidence that Bill Nelson did or ever would place contaminated material on his farm. There was no incentive for him to do so and it would have been wholly inconsistent with the quality of his character. He was a successful businessman with an outstanding reputation in the community. He would never have risked his reputation or his health and that of his family by placing contamination on the property, nor would he have ever done anything to cause harm to the farm or the horses that he and his wife and family loved. Allegations to the contrary are not only false, they are disappointing because they attack a man and his wife who are no longer alive to defend themselves.

## **II. Unsubstantiated Allegations Do Not Provide a Sufficient Basis to Reject the Plat Application or Require MTCA Action**

The opposition letter's speculative and unsupported statements of alleged environmental contamination at Gunshy Farm are disproved with actual facts and environmental data. Substantial portions of the property will not be developed as part of this project, including the area that the opposition letter speculates is contaminated.

The opposition letter and exhibits contain no environmental data or other acceptable evidence of a release of hazardous substances at Gunshy Farm that exceeds cleanup levels under MTCA<sup>4</sup> or CERCLA, or otherwise establishes a risk to human health and the environment based on "best professional judgment" as required by law.<sup>5</sup>

"Best professional judgment" typically involves that of a qualified environmental professional and does not include rumors and suspicion. Department of Ecology ("Ecology") guidance under MTCA clarifies that parties should only look to "available physical evidence" that already exists when determining whether there is a release or reporting obligation:

Persons should rely on available physical evidence to determine whether hazardous substances have been released to the environment. . . . Examples of physical evidence include visual observations, readings from field instruments, and lab data. Ecology does not expect that additional testing be performed for the purpose of complying with the reporting

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<sup>3</sup> Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601, *et seq.*

<sup>4</sup> Washington Model Toxics Control Act, RCW 70.105D.

<sup>5</sup> "Any owner or operator who has information that a hazardous substance has been released to the environment at the owner or operator's facility *and* may be a threat to human health or the environment shall report such information to the [Department of Ecology] . . . . Persons should use *best professional judgment* in deciding whether a release of a hazardous substance may be a threat or potential threat to human health or the environment." WAC 173-340-300(2)(a) and (b) (emphasis added).

requirements of WAC 173-340-300 or this policy, only that available information is provided. (Ecology, Toxics Cleanup Program Policy 300: Site Discovery–Reporting Releases, Section 4).

None of the rumors or speculation in the opposition letter rises to the level of “available physical evidence” under MTCA that would compel a remedial investigation or reporting obligation to Ecology.

Similarly, under CERCLA, “knowledge of any [unpermitted] release . . . of a hazardous substance . . . in quantities equal to or greater than” reportable quantities established by EPA prompts a reporting obligation to the National Response Center. 42 U.S.C. § 9603(a); *see also* 40 CFR 300.125. Upon knowledge of a release of a hazardous substance or a “substantial threat of a release into the environment of a pollutant or contaminant *which may present an imminent and substantial danger to the public health or welfare*,” EPA may perform or order potentially liable parties to perform a remedial investigation or other remedial actions. 42 U.S.C. § 9604(a)(1) (emphasis added); *see also*, 40 CFR 300.130.

None of the allegations in the letter trigger any reporting or remedial investigation obligations under CERCLA because there is no *knowledge* of a release of hazardous substances or the threat thereof (only unsubstantiated rumors that contradict known facts and data).

### **III. Contaminated Fill Was Not Placed on Thompson Field**

The area of Gunshy Farm that received fill material is currently known as the “Thompson Field.” (*See* Ex. 2, Gunshy Parcel Ownership by Year Map). This is the same general area referenced in the Army Corps of Engineers 1984 correspondence, which is attached to the opposition letter as Exs. C and D and to this letter as Ex. 3.<sup>6</sup> The opposition letter appears to allege that this area was used as a landfill from approximately February 1957 through the 1980s. However, because the Nelsons did not purchase the Thompson Field until 1975, which at the time was heavily forested, no filling of the field could have taken place until after 1975. This area was never used as a landfill.

As shown in Ex. 2, the Nelsons’ first purchase of land that became part of Gunshy Farm (a purchase that included the main house where the Nelsons lived), occurred in 1957. At the time of that initial purchase, Thompson Field was still wooded. That field was not cleared until sometime after the Nelsons bought the Thompson parcel in 1975. (*See* Ex. 2, Gunshy Parcel Ownership by Year Map).

Buff Nelson, a son of Bill and Barbara Nelson, recalls his parents telling him that, after the 1975 acquisition of the Thompson Field property and the subsequent clearing of trees, dirt

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<sup>6</sup> *See* Ex. 3, 1984 Correspondence between William C. Nelson and Army Corps of Engineers. In a letter dated May 10, 1984 to the Army Corps, Bill Nelson states, in response to some questions from the Corps, that “this work was started in February, 1957.” From this, the opposition incorrectly infers that fill activity took place at Gunshy Farm since 1957. However, the “work” described in Mr. Nelson’s May 1984 letter was probably referring to “the farming operation,” which is discussed in the letter’s second paragraph as being performed “on a continuous basis.” This “work” could also mean the horse breeding business. The “work” could *not* mean filling Thompson Field in 1957 because the Nelsons did not own that field until almost 20 years later, as shown in Ex. 2.



was trucked to the property from an Interstate 90 ("I-90") project. The dirt was used to level out Thompson Field. This timeframe coincides with the well-publicized excavation work for the expansion of I-90, which included a tunnel project that was underway in February 1983 in the Mount Baker Ridge area of Seattle. As part of the I-90 project, large quantities of clean dirt were excavated during the construction of the Mount Baker Ridge Tunnels and hauled to many sites within the greater-Seattle area; this work was followed by further clean dirt excavation from the portion of the I-90 project on Mercer Island and southern Bellevue. (Ex. 4, I-90 Newspaper Articles and Information).<sup>7</sup> Construction demolition was not part of this work.

The I-90 project started in early fall 1982, when the Washington State Department of Transportation contracted with a construction company to excavate and construct the new tunnels at Mount Baker Ridge.<sup>8</sup> By February 1983, work had begun to excavate "glacial till, clay, and sand" from Mount Baker Ridge. (Ex. 4, *Seattle Times*, February 16, 1983).

The I-90 project generated millions of cubic yards of "**silt, clay and sand**," and finding sites for the soil was a major part of digging the tunnel. (Ex. 4, *Seattle Times*, June 11, 1984). This **clean fill material** was widely dispersed throughout the region.<sup>9</sup> Among other locations, some of the dirt was used as fill at Seattle-Tacoma Airport and "to make a hill for a network of amusement park slides at . . . Waterworks Park in Issaquah." Another chosen location for the dirt was Cadman Sand and Gravel Pit in Redmond (Ex. 4), which is located less than two miles from Gunshy Farm.

In discussing where dirt from the I-90 project excavations would be taken, a City of Seattle report discussed the customary practice of contractors taking clean dirt from excavations to use at other sites.<sup>10</sup> (b) (6) declaration, attached as Ex. B to the opposition letter, states that he worked at the Cadman Sand and Gravel Pit during the 1970s and 1980s, and that large amounts of dirt were trucked at night to Thompson Field at Gunshy Farm. Nighttime trucking of dirt has long been typical in the Seattle area, including the Eastside in order to minimize traffic congestion during daytime hours. As an example, the *Seattle Times* reported that the I-90 contractor struck a deal with the City of Redmond allowing the contractor to take about 300,000 cubic yards of the I-90 dirt to the Cadman Sand and Gravel Pit, but the City only allowed the dirt to be hauled there during nighttime hours. (Ex. 4, *Seattle Times*, July 18, 1985). Reported estimates were that it would take 300 truckloads a night for two months to complete the project.

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<sup>7</sup> Ex. 4, *Seattle Times*, June 11, 1984 (Contractors unearthed soil from the Mount Baker Ridge hill when digging a three-level tunnel to extend I-90).

<sup>8</sup> See *Everett Concrete Products. v. Dep't of Labor & Indus.*, 109 Wn2d 819, 820 (1988).

<sup>9</sup> In the construction industry, "clean fill" is a term that refers to clean dirt. "Clean fill" is often needed and used to fill in excavated areas at construction sites. The term "fill" in this context is separate and distinct from the use of the term "fill" under Section 404 of the Clean Water Act.

<sup>10</sup> See Ex. 4, City of Seattle, Consultant's I-90 Report, June 1982 at 25 ("I have been told that the material to be removed from the tunnel and from the excavated portions of the lidded sections will be blue clay and rock . . . . In practice, the contractors will frequently find someone who wants some extra dirt and will buy it from the contractor delivered to his site. The contractor is thus able to dispose of the material and make profit on it also.").



Consequently, if dirt was hauled to Gunshy Farm at night, that hauling would have been entirely consistent with traffic impact minimization.

Based on the actual facts, clean dirt from the I-90 excavation was trucked to Thompson Field. That dirt consisted of clay, silt, and sand and was not contaminated. Moreover, Thompson Field does not encompass any of the lots proposed as part of the proposed Gunshy Manor preliminary plat. Further, large portions of the property will also remain undisturbed as part of the proposed subdivision project.

The opposition letter also erroneously alleges at page 3 that “demolition debris from apartment buildings and gas stations were dumped on the property at various times . . . from approximately 1957 through the 1980s.” This false allegation is based solely on the (b) (6) declaration, which states that, “in the 1960s there was a new Enco gas station built on the site of the old Texaco station in downtown Redmond” on property owned by Bill Nelson. From this declaration, the opposition letter erroneously implies that debris from this gas station was brought to the Farm, even though (b) (6) declaration does not make that assertion. As explained above, any debris from retrofitting the gas station – *a retrofitting that took place around 1968* – could not have been placed on Thompson Field because the Nelsons did not own Thompson Field until 1975 – seven years later.<sup>11</sup> Moreover, metal underground storage tanks were valuable as a recycled material and taking the tanks to a recycler for money would have been an easier and more profitable, logical, and customary way to dispose of the tanks.

#### **IV. Environmental Sampling Data Show Clean Water at Gunshy Farm**

In addition to the water provided by the Union Hill Water Association to Gunshy Farm’s doublewide manufactured home, which is located near the Farm’s 196<sup>th</sup> Avenue NE entrance, Gunshy Farm has a hillside spring and a water storage reservoir, which together supply water to the Farm. Additionally, a water well is located on a small parcel acquired in January 2018 (currently known as Assessor’s Parcel No. 0882506-9067 or the “Evans Parcel”), which is now part of the north end of the overall subdivision site. Testing of the spring water and well water establishes that there is no health concern or any evidence of contamination, which directly contradicts allegations in the opposition letter.<sup>12</sup>

Available test results for the spring, which provided water to the main house, guest house, and fields for decades, show non-detect levels for most of the contaminants of concern in the opposition letter, including heavy metals, such as mercury and lead, and other contaminants,

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<sup>11</sup> See Ex. 5, City of Redmond Tax Records. Historical tax records for the City of Redmond for the gas station property reflect that, by November 30, 1968, there were “no tanks” or other equipment left at the gas station property that were part of the prior Texaco station. The tax records indicate that the Texaco building, gas tanks, and other equipment were “torn down” and no longer at the site as of 1968.

<sup>12</sup> Without providing any evidence of contamination or supporting data, the opposition letter at pages 1 and 3 alleges that drinking water supplies for local residents may have been adversely affected and improperly attempts to draw a connection between the water sources at Gunshy Farm and the death of a former employee, (b) (6). Notably, (b) (6) left Gunshy Farm years before his death. No information is publicly available regarding his cause of death, and the clean analytical results for the water supply at Gunshy Farm rule out any causal connection with (b) (6).



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such as copper, chromium, aluminum, and chloride. (Ex. 6, Gunshy Spring Map and Test Results).

The well at Gunshy Farm is located on the recently acquired Evans Parcel. Available test data for the well shows that the water is clean. (Ex. 7, Evans Parcel Well Map and Test Results). Additionally, the domestic water supply for the proposed subdivision is proposed to be provided by the Union Hill Water Association. No concern exists as to the quality of that water supply. The water at Gunshy Farm is clean.

Finally, Gunshy Farm is surrounded on all sides by residential housing, creeks, parks, and a nature preserve. Yet, beyond Evans Creek and the residential homes that lie near it, to the west and northwest of the Farm there are many industrial sites. (Ex. 8, Industrial Sites Map). At least five of those sites have been the subject of remedial actions under MTCA. The opposition letter fails to mention these facts.

For all the reasons set forth above, the opposition letter provides no basis for DPER to stop processing Preliminary Plat Application No. PLAT18-0007. We would be happy to answer any questions you may have. Please let us know if a meeting would be helpful. Thank you.

Very truly yours,

FOSTER PEPPER, PLLC



Lori Terry Gregory  
Joanne Kalas

cc (w/ enclosures):

William C. "Buff" Nelson  
Dow Constantine, King County  
Maia Bellon, Washington State Department of Ecology  
Robert Warren, Washington State Department of Ecology  
James Woolford, United States Environmental Protection Agency  
Chris Hladick, United States Department of Ecology, Region 10  
Sheryl Bilbrey, United States Environmental Protection Agency, Region 10  
Edward Kowalski, United States Environmental Protection Agency, Region 10  
Matthew Bennett, United States Army Corps of Engineers  
The Honorable Maria Cantwell  
The Honorable Patty Murray

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Enclosures:

- Ex. 1: Washington Thoroughbred Breeders Racing Hall of Fame
- Ex. 2: Gunshy Parcel Ownership by Year Map
- Ex. 3: 1984 Correspondence between William C. Nelson and Army Corps of Engineers
- Ex. 4: I-90 Newspaper Articles and Information
- Ex. 5: City of Redmond Tax Records
- Ex. 6: Gunshy Spring Map and Test Results
- Ex. 7: Evans Parcel Well Map and Test Results
- Ex. 8: Industrial Sites Map



# **Ex. 1**

## **Washington Thoroughbred Breeders Racing Hall of Fame**

<http://washingtonthoroughbred.com/william-c-and-barbara-nelson-jr-gunshy-manor/>

(b)(4) copyright & (b)(6)





(b)(4) Copyright





# WASHINGTON RACING HALL OF FAME ANNOUNCES CLASS OF 2014

(b)(4) Copyright



**From:** "Susan van Dyke" <[sue@washingtonthoroughbred.com](mailto:sue@washingtonthoroughbred.com)>

[Washington Thoroughbred Breeders & Owners Association]

**Date:** August 4, 2014 at 2:19:27 PM PDT

**Subject:** Favored One's Granddaughter Wins Queen's Plate

## Favored One's Granddaughter Wins Queen's Plate

The July 6, Queen's Plate (Can-G1), the first race in the Canadian Triple Crown, featured 14 Canadian-bred sophomore colts and geldings and one lone filly vying for the million dollar purse. The historic race was handily won by (b) (6) talented Lexie Lou, who came from off the pace to become the 35th filly in its 155 runnings to triumph and the sixth filly to win the Woodbine Oaks and Plate since 1956. On June 15, the Ontario-bred filly had won the \$460,968 Woodbine Oaks presented by Budweiser by 4 1/2 lengths. (Note: Barber also co-owned Washington-bred champion and Grade 2 Canadian stakes winner Fast Parade, a 2004 WTBOA sale graduate.)

The daughter of Sligo Bay (Ire) out of Oneexcessivite, by In Excess (Ire), was ridden to her 1 1/2 -length win by (b) (6), in his second Plate victory. It marked the first victory in the classic for six-time Sovereign Award-winning trainer (b) (6). Her final time in the 12-furlong race was 2:03.94.

Lexie Lou's second dam is two-time Washington champion and Grade 2 winner Favored One, a daughter of 1982 Queen's Plate winner Son of Briartic bred by the late Bill and Barbara Nelson. Favored One, a \$227,965 earner, was a \$15,000 RNA at the 1993 WTBOA Winter Mixed Sale.

With her \$563,220 winner's share, Lexie Lou, who had been purchased privately by Barber after her first 2014 start in April - a fourth place finish in the Star Shoot Stakes - has now earned \$1,172,658 and improved her record to 5-2-2 from a dozen starts. Bred by Paradox Farm, she had originally been sold for \$5,500 Canadian funds at the 2013 Ontario September Yearling Sale.

The two-time juvenile stakes winner also ran third in the \$137,992 Fury Stakes at Ontario track in May.

Assuming she is named 2014 Canadian champion three-year-old filly, Lexie Lou will be the second Canadian champion with a connection to the Nelsons and their Redmond-based Gunshy Manor. The Nelsons and partners (b) (6) bred and sold an Honor Grades filly for \$97,000 through the 2000 WTBOA Summer Sale. Later named High On Believen (and out of Candles n Moonlite, who was named Washington champion juvenile filly the year following Favored One), she never won, but her daughter Dancing Allstar (by Millennium Allstar) was voted 2007 Canadian champion two-year-old filly. The Nelsons are among the four finalists for top breeder on the 2014 Washington Racing Hall of Fame ballot.



## **Ex. 2**

### **Gunshy Parcel Ownership by Year Map**



NOTE: Colored boxes show approximate boundaries of parcels acquired by the ☹☹ over the years. White dashed lines show present property boundary.



Photometry International Corp. 2015



0 200 400  
1 inch = 400 feet

# Nelson Estate Gunshy Manor Boundary

King County Aerial 2015

Data Source:  
Parcel shape and location extracted from King  
County Assessor Map GIS Shapefile (2017).  
  
Aerial provided by King County ArcGIS Online,  
2015 Imagery.  
  
Date: 1/26/2018  
User: SavannaN



## **Ex. 3**

**1984 Correspondence between William C. Nelson  
and Army Corps of Engineers**





CERTIFIED MAIL



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
SEATTLE DISTRICT, CORPS OF ENGINEERS  
P.O. BOX C-3755  
SEATTLE, WASHINGTON 98124

APR 27 1984

*Bowling 3475*  
*4/11/84*

Regulatory Functions Branch

Mr. William Nelson  
20031 Northeast 80th  
Redmond, Washington 98052

Reference: 071-OYB-4-009379-C  
Nelson, William

Dear Mr. Nelson:

A recent inspection of activities along Evans Creek on your property near Redmond, King County, Washington, has disclosed that you have placed fill on wetlands adjacent to waters of the United States without a Department of the Army permit. This work is considered to be in violation of Federal law.

The following laws, extracts enclosed, apply to the unauthorized work:

Clean Water Act.

a. Section 404 prohibits the placement of any fill or dredged material in waters of the United States and adjacent wetlands not authorized by Department of the Army permit.

The term "wetlands" means those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The Corps of Engineers has the responsibility for determining whether a specific wetland area is within Section 404 jurisdiction.

b. Section 309 cites penalties for violation of Section 404.

You are directed to do no further filling on wetlands adjacent to Evans Creek at this site. To assist in the evaluation of this violation, the following information is requested:

a. As-built sketch of the work within Corps jurisdiction.

b. Who did the work? If a contractor, please furnish name, address, and telephone number.

c. Date when the work started.

- d. Reasons why the work was started before obtaining a Department of the Army permit.
- e. Property ownership at time of construction.
- f. Primary purpose of the fill.
- g. Practicable alternatives available that would not involve filling of wetlands.

Your sketch should be drawn to scale and include plan, elevation and section views of the work. The location of the fill in relation to your property lines and the original landward limits of the adjacent wetlands should be shown on the plan view. This information must be furnished within 30 days from the date of this letter.

Your comments will be beneficial in resolving this matter. If you have any questions concerning your reply, please contact Mr. Michael Bowlus, telephone (206) 764-3495.

Sincerely,

*for Paul W. Rea, LTC*  
Norman C. Hintz  
Colonel, Corps of Engineers  
District Engineer

Enclosure

EXTRACTS FROM THE  
FEDERAL WATER POLLUTION CONTROL, ACT AMENDMENTS  
OF 1972 - APPROVED 18 OCTOBER 1972

Section 309 of the Federal Water Pollution Control Act Amendments of 1972 provides that any person who willfully or negligently violates the provisions of this Act may be punished by a fine of not less than \$2,500 or more than \$25,000 per day of violation or by imprisonment for not more than one year or by both. In addition any person violating this Act may be subject to a civil penalty of not more than \$10,000 per day of violation.

EC. 404. (a) The Secretary of the Army, acting through the Chief of Engineers, may issue permits, after notice and opportunity for public hearings for the discharge of dredged or fill material into the navigable waters at specified disposal sites.

Notice, hearing  
opportunity.

"(b) Subject to subsection (c) of this section, each such disposal site shall be specified for each such permit by the Secretary of the Army (1) through the application of guidelines developed by the Administrator, in conjunction with the Secretary of the Army, which guidelines shall be based upon criteria comparable to the criteria applicable to the territorial seas, the contiguous zone, and the ocean under section 403 (c), and (2) in any case where such guidelines under clause (1) alone would prohibit the specification of a site, through the application additionally of the economic impact of the site on navigation and anchorage.

"(c) The Administrator is authorized to prohibit the specification (including the withdrawal of specification) of any defined area as a disposal site, and he is authorized to deny or restrict the use of any defined area for specification (including the withdrawal of specification) as a disposal site, whenever he determines, after notice and opportunity for public hearings, that the discharge of such materials into such area will have an unacceptable adverse effect on municipal water supplies, shellfish beds and fishery areas (including spawning and breeding areas), wildlife, or recreational areas. Before making such determination, the Administrator shall set forth in writing and make public his findings and his reasons for making any determination under this subsection."

Disposal site,  
specification  
prohibition.

U. S. ARMY ENGINEER DISTRICT, SEATTLE

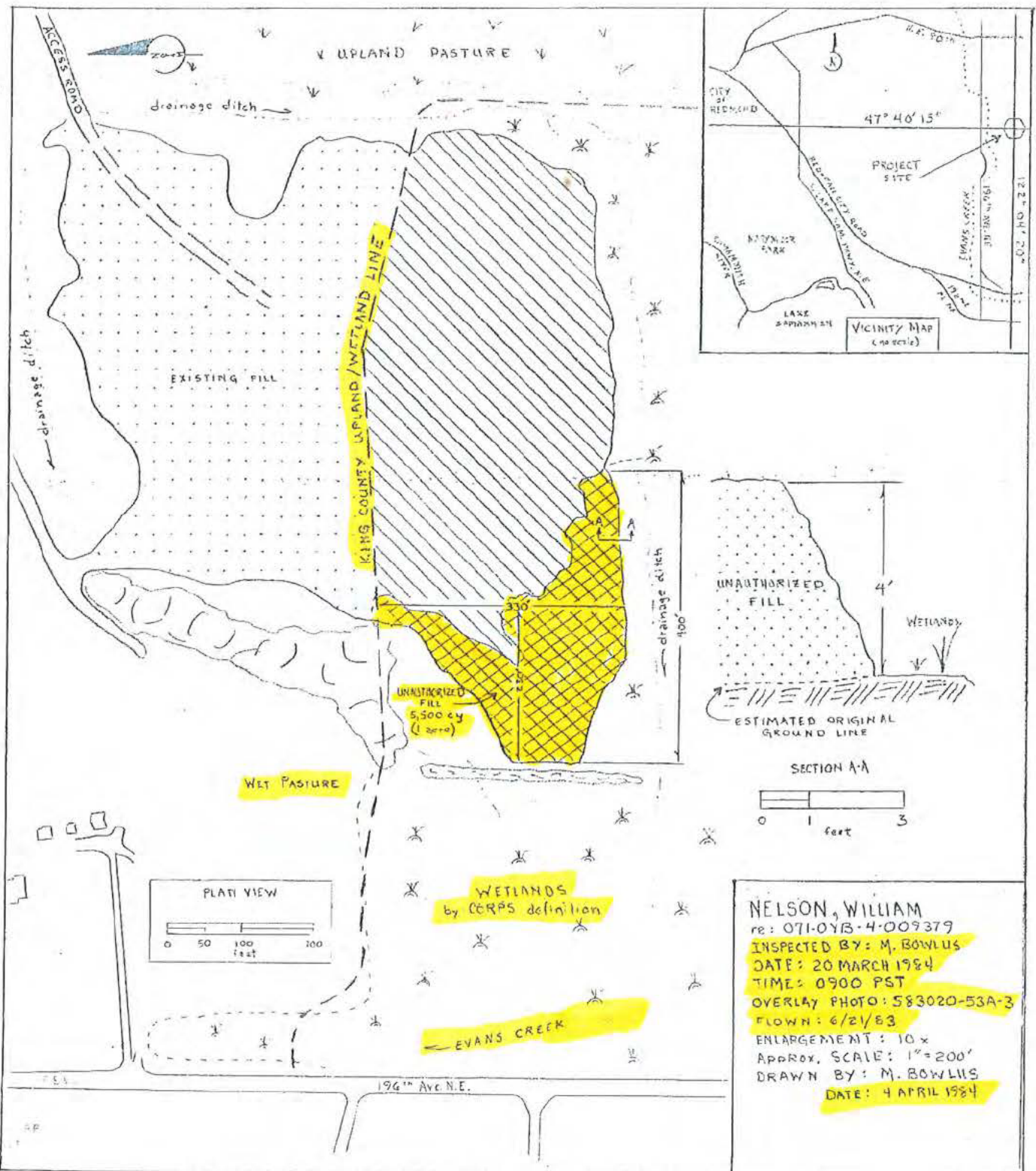
PROJECT NELSON, WILLIAM re: 071-0YB-4-009379

SUBJECT Alleged unauthorized filling of wetlands adjacent to Evans Creek

BY M. BOWLUS DATE 4 APR 84 CHECKED

1761

PAGE





## **Ex. 4**

### **I-90 Newspaper Articles and Information**

Rmc

October 22, 1982

Dear

The next meeting of the Interstate 90 Citizens Advisory Committee is scheduled for Tuesday morning, October 26, 1982 at 9:00 a.m. in the second floor conference room of the 400 Yesler Building. The meeting is not expected to take more than two hours.

The tentative schedule is:

1. Announcements.
2. Update of City/State WBE procedures by John Franklin.
3. Discussion of community proposals for the disposition of surplus housing.
4. Discussion of cash flow for the Interstate 90 Project. The Washington State Department of Transportation (WSDOT) sent the letter of contract award to Guy F. Atkinson, the low bidder on the Mt. Baker Ridge Tunnel, on Wednesday, October 20, 1982. WSDOT's estimate was \$78,979,919 and the low bid was 538,272,282.

Very truly yours,

EUGENE V. AVERY  
Director of Engineering

By  
Robert M. Chandler  
Interstate 90 Coordinator

EVA:RMC:cw

# Construction of I-90 link will finally begin next month

by William Gough  
Times staff reporter  
(b)(4) Copyright

(b)(4) Copyright

## City to fund Magic Carpet for 3 months

by Lee Moriwaki  
Times staff reporter

(b)(4) Copyright

(b)(4) Copyright

# Schools may swap stadium for site across street

by Constantine Angelos and Sally Mahoney  
Times staff reporters  
(b)(4) Copyright

(b)(4) Copyright



Some of the few revelers who showed up for the end of Fat Tuesday pose in their costumes. Barry Wong / Seattle Times

## Fat Tuesday celebration here simmers to anticlimactic end

by Don Duncan  
Times staff reporter  
(b)(4) Copyright

(b)(4) Copyright

## Bills seek exemption from usury limit for auto-leasing companies

by Bill Dietrich  
Times staff reporter  
(b)(4) Copyright

(b)(4) Copyright

## Drilling for I-90 tunnel through Mount Baker Ridge is under way

by William Gough  
Times staff reporter  
(b)(4) Copyright

(b)(4) Copyright



# Was Royer improperly bumped from delegation?

by Dick Clever  
Times staff reporter

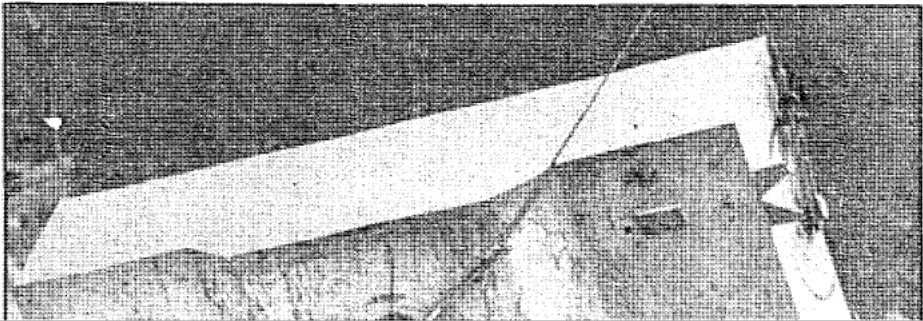
(b)(4) Copyright

(b)(4) Copyright

## Tunnel dirt

It's a haul of a headache

by William Gough  
Times staff reporter



## Demonstrators hold vigil on bomb route into Trident sub base

by Peyton Whitely  
Times staff reporter

(b)(4) Copyright

(b)(4) Copyright

## Campus police lose cash to bold burglar

(b)(4) Copyright

## Curbside ruling

With Coroner Otto Middelstadt, inquests were joyful undertaking

(b)(4) Copyright

(b)(4) Copyright

**RICK ANDERSON**  
Times staff columnist

(b)(4) Copyright

# Officials butting heads against prolific goats in Olympic park

(b)(4) Copyright

## Great Dirt Disposal expected to intensify

(b)(4) Copyright

### DIRT

(b)(4) Copyright

## New Orleans washes Seattle out of taste test

(b)(4) Copyright

## Study to seek source of dirt particles in air

(b)(4) Copyright

## Blood Center puts out urgent call for donors

(b)(4) Copyright

## 3 shrimp-boat crewmen rescued after boat sinks

(b)(4) Copyright

## NORTHWEST TODAY

Times staff and news services.

### Rajneesh opponent wants state ethics-commission investigation to continue

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(b)(4) Copyright

## Liquor clerk shot by robber at Ballard bank

(b)(4) Copyright

### Nursing home cited for deficiencies

(b)(4) Copyright

### ALASKA

#### One of seven victims found in river

(b)(4) Copyright

### Storms trigger Willamette River floods

(b)(4) Copyright

### Cancer Counseling

(b)(4) Copyright

Other Northwest news: D 1-3.

## How far can hard work take you? Ask Ron & Mike.

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## ISLANDERS EXPECT VICTORY, BY 1992, IN THEIR DUSTY I-90 WAR

*Seattle Times, The (WA) (Published as THE SEATTLE TIMES) - July 2, 1985*

- Author/Byline: JIM SIMON; TIMES EAST BUREAU
- Edition: FOURTH
- Section: NORTHWEST
- Page: B1

(b)(4) Copyright





EASTSIDE

Seattle Times, The (WA) (Published as THE SEATTLE TIMES) - July 18, 1985

- Author/Byline: TIMES EAST BUREAU
- Edition: ZONE 1
- Section: EAST TIMES
- Page: D2
- Column: EASTSIDE
- Readability: >12 grade level (Lexile: 1580)
- (b)(4) Copyright



## THE LIGHT AT THE END OF THE I-90 TUNNEL THREE YEARS LATER, EXCAVATION IS DONE

*Seattle Times, The (WA) (Published as THE SEATTLE TIMES) - March 13, 1986*

- Author/Byline: WILLIAM GOUGH
- Edition: THIRD
- Section: NORTHWEST
- Page: D1
- Readability: 11-12 grade level (Lexile: 1210)

(b)(4) Copyright





# SEATTLE'S FREEWAY REVOLT: A DIRECTORY OF HISTORICAL RESOURCES





## 8. NARRATIVE TIMELINE

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This section provides a chronological listing of major events in the evolution of Seattle's freeway revolt, encompassing administrative, legal and political actions involving the City of Seattle, State of Washington and Seattle citizens. The primary focus is on the three major freeway projects that became the target of citizen opposition: the Mercer Street Connection, which became the Bay Freeway (**BAY**); the Empire Expressway, which became the R. H. Thomson Expressway (**RHT**); and the segment of Interstate 90 (**I-90**) from Mercer Island to Seattle I-5. Several events of broader significance are also included for historical context as well as relevance to highway planning.

The timeline is segmented into the timeframes shown below.

- **1912 - 1944: Early milestones**
  - **1947 - 1959: Freeway plans emerge**
  - **1960 - 1964: Route refinements, funding and early resistance**
  - **1965 - 1967: Planning advances, opposition grows**
  - **1968: Citizens organize**
  - **1969: Hearings, rallies, media and more**
  - **1970 - 1971: I-90, Bay Freeway opposition builds; citizens take legal action**
  - **1972 - 1974: Voters scrap RHT, Bay Freeways; I-90 saga continues**
  - **1975 - 1980: I-90 modifications and mediation**
  - **1981 - 1993: I-90 construction**
- 

### **1912 - 1944** **Early milestones**

#### **1912 (March 5)**

**RHT:** Seattle voters reject the Bogue "Plan of Seattle" which includes a major north-south route through the City's east side. Over the years, the Seattle Planning Commission recommends varying routes to extend Empire Way north to Bothell Way.

#### **1940 (July 2)**

**I-90:** The First Lake Washington Floating Bridge (U.S. 10), the Lacey V. Murrow Bridge, opens with four lanes connecting Seattle and Mercer Island. It is the world's longest floating concrete pontoon bridge. The unusual draw span bulge accommodates the passage of ships. Eventually, it will become part of the I-90 corridor.

#### **1944**

Voters approve Amendment 18 to the Washington State Constitution which creates the State Highway Trust Fund, guaranteeing that gas and vehicle excise taxes will be used exclusively toward highways.

### **1947 - 1959** **Freeway plans emerge**

#### **1947**

The State Highway Department publishes the Origin-Destination Traffic Survey: Seattle Metropolitan Area, **which** drives future highway decision-making in the region.



## **1981 - 1993**

### **I-90 construction**

#### **1981 (July, September)**

**I-90:** The new high-level East Channel Bridge is completed and allows passage of ships. Soon after, the hazardous U. S. 10 floating bridge draw span bulge is removed and replaced with a straight roadway.

#### **1982 (May, October)**

**I-90:** Seattle Mayor Royer establishes a completely new citizen design advisory committee to oversee I-90 construction. Construction begins on the new Mt. Baker Ridge tunnel.

#### **1983 - 1985**

**I-90:** Construction begins on the Mercer Island portion of the project and the floating bridge pontoons. Center pontoons are placed for the new floating bridge. Construction begins on approach spans connecting the new floating bridge to Seattle and Mercer Island and the new roadway to connect I-90 with I-5.

#### **1986 - 1988**

**I-90:** Work begins on the interior of the Mt. Baker Ridge tunnel, the Mercer Island and Seattle lids and the remaining roadway sections.

#### **1989 (June 4)**

**I-90:** The Third Lake Washington or Homer M. Hadley Floating Bridge (I-90) and Second Mount Baker Tunnel (the world's largest diameter tunnel through soft earth) open with horse-drawn covered wagons and a stagecoach as part of Washington State Centennial Celebrations. Meanwhile, work continues on replacing the old U.S. 10 floating bridge with a new I-90 floating bridge.

#### **1993 (September 12)**

**I-90:** The newly rebuilt First Lake Washington or Lacey V. Murrow Memorial Floating Bridge officially opens with 3 eastbound lanes, 2 transit-carpool-Mercer Island lanes (designed to accommodate future rail transit) and 3 westbound lanes. Interstate 90 from Boston to Seattle is completed.

#### **1994 (July)**

**I-90:** Media coverage cites continuing struggles of Judkins Rejected residents to rebuild their neighborhood, just north of I-90 between 23rd Avenue and Martin Luther King Way. The area is still dominated by state-owned properties, which have been neglected for 26 years.

Your City, Seattle

Memorandum

HC  
+  
ATK

ROUTING	DATE	INITIAL
ACTION		
AEM/RPL/FMC		
FILE		
INFORMATION		
EVA		



Date June 22, 1982

To All Councilmembers

From Jeanette Williams

Subject Consultant's I-90 Report

CSS 25.3 (Rev. 4/75)

Attached is the final report from our consultant, Art Elliott, on I-90.

I feel he raises some excellent points. I particularly refer you to the Appendix where he discusses a philosophy on amenities.

If you have any comments on Mr. Elliott's report, I would appreciate receiving them by Monday morning, June 28. I want to be able to submit our comments along with Mr. Elliott's report to the newly formed I-90 Citizens Advisory Committee.

Thanks for your assistance.

JW:lm  
Att.

82 JUN 28 P 4: 23

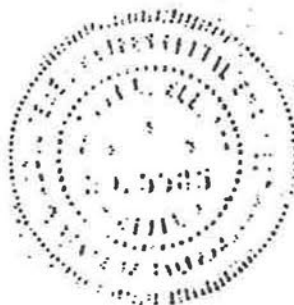
SEA FILE ENG. DEPT.

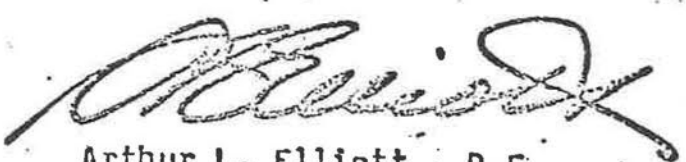
# A REVIEW of the CONSTRUCTION and its SEQUENCE for I-90 THRU SEATTLE

## CONTENTS

INTRODUCTORY SUMMARY	Page 1
Task Given the Consultant	2
Summary of Results of Study	4
THE PLANNING PROCESS	6
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THE WSDOT'S PRESENT INTENTIONS	11
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A Bit of Philosophy About Amenities	18
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Done for  
THE CITY COUNCIL  
of Seattle



  
Arthur L. Elliott, P.E.  
Bridge Engineer

June 15, 1982



are designed the volume of the various parts will be computed and they will be paid for at unit prices but these will tell only part of the story of their true cost. If the lids were to be added last in Phase III, a part of their cost should be the cost of traffic diversion and safety protection plus temporary supports during construction. An estimator could probably arrive at a guess of the cost of the individual pieces of work but it would be just an educated guess.

8. Q: To where will the dirt from the tunnel be moved?  
Will this have significant environmental impact?

Ans: I have been told that the material to be removed from the tunnel and from the excavated portions of the lidded sections will be blue clay and rock - material not suited for use as topsoil and covering over the lids. Therefore, the material will be entirely removed from the site - probably by barge. It is customary for the State to find a disposal site which will be compatible with environmental requirements and then make the site available to the successful contractor as a place to dump the waste material. In practice, the contractors will frequently find someone who wants some extra dirt and will buy it from the contractor delivered to his site. The contractor is thus able to dispose of the material and make a profit on it also. In any event, the environmental considerations must be covered in advance so no undesirable impact will result.

9. Q: Is there any information which you would like from the

## **Ex. 5**

### **City of Redmond Tax Records**

71988

0075-5

ADDITION

REIMOND ADD.

1/4 SECTION

11

TWP.

25

N. RANGE

5

BLOCK

5

LOT

4

SPLIT VALUATION

DESCRIPTION

LIMITS

719880-00755

650 0700  
3420

OWNER OR CONTRACT PURCHASER	DATE	FILE NUMBER	PRICE	REMARKS
				THE TEXAS CO.
				<i>KILL - AC (3) - 7/24/68 - 5-3309</i>
				<i>1004076 N9744</i>

DISTRICT	ROAD	SCHOOL	WATER	FIRE	SEWER	HOSPITAL	AIRPORT	FERRY	METRO
Redmond		1114				HOS. #2			

## ASSESSED VALUE

YEAR	ACRES	TIMBER	LAND	BLOCK	TOTAL	DATE	BY	REASON	SEG. NO.
19				0075					
1958			0075	650	650	5/8/57	EH(T)	(3 Tanks, 1 Hoist)	E - 2611
1967						11/20/68	EL	No tanks, hoist pumps, etc. Kamps left to be placed to be taken down R.V.	
19									
19									
19									
19									
19									
19									
19									
19									
19									





5



6



71988

4075

~~SPLIT VALUATION~~

LIMITS	AC	LAND	SCHOL	WATER	PIPE	SEWER	HOSPITAL	ATHLETIC	FERRY	METRO
Belmont	Madwood	414					NOS. 02			
							719880-0075		2100	2350-0700 2600
YR	AC	LAND	BLDG	TOTAL	BY	DATE	REASON	FEE	OWNER	DATE
19 52		800	50	850	R.G.	3-50	2nd 1/2 inch sewer	4.50	W. H. H. Co.	3-50
19 53		800	2150	2950	DP	5/22	50" 1/2 inch road	10.00	W. H. H. Co.	5-22
19 54		1100	2150	3250	RS	11/8				11-8
19 55		1100	3000	4100	W.H.	3/1/55	R.V.			
19 56		1200	3000	4200	W.H.	3-25-56	R.V.			
19 56		1300	3350	4650	F.H.	5/9/56	Split Valve	See 1955		E-26H
19 62		2160	3350	5510	H.	8-11-60	R.V.			
19 69		2400	400	2800	EL	1/30/68	No pump	20.00	W. H. H. Co.	1-30-68
19 70		2880	9600	12480	W.D.	6-26-68	City of J. Conner	2.00	W. H. H. Co.	6-26-68
19 71	L	5760 B	19200 T	24960	719880-0075-0	B/9				

## **Ex. 6**

### **Gunshy Spring Map and Test Results**

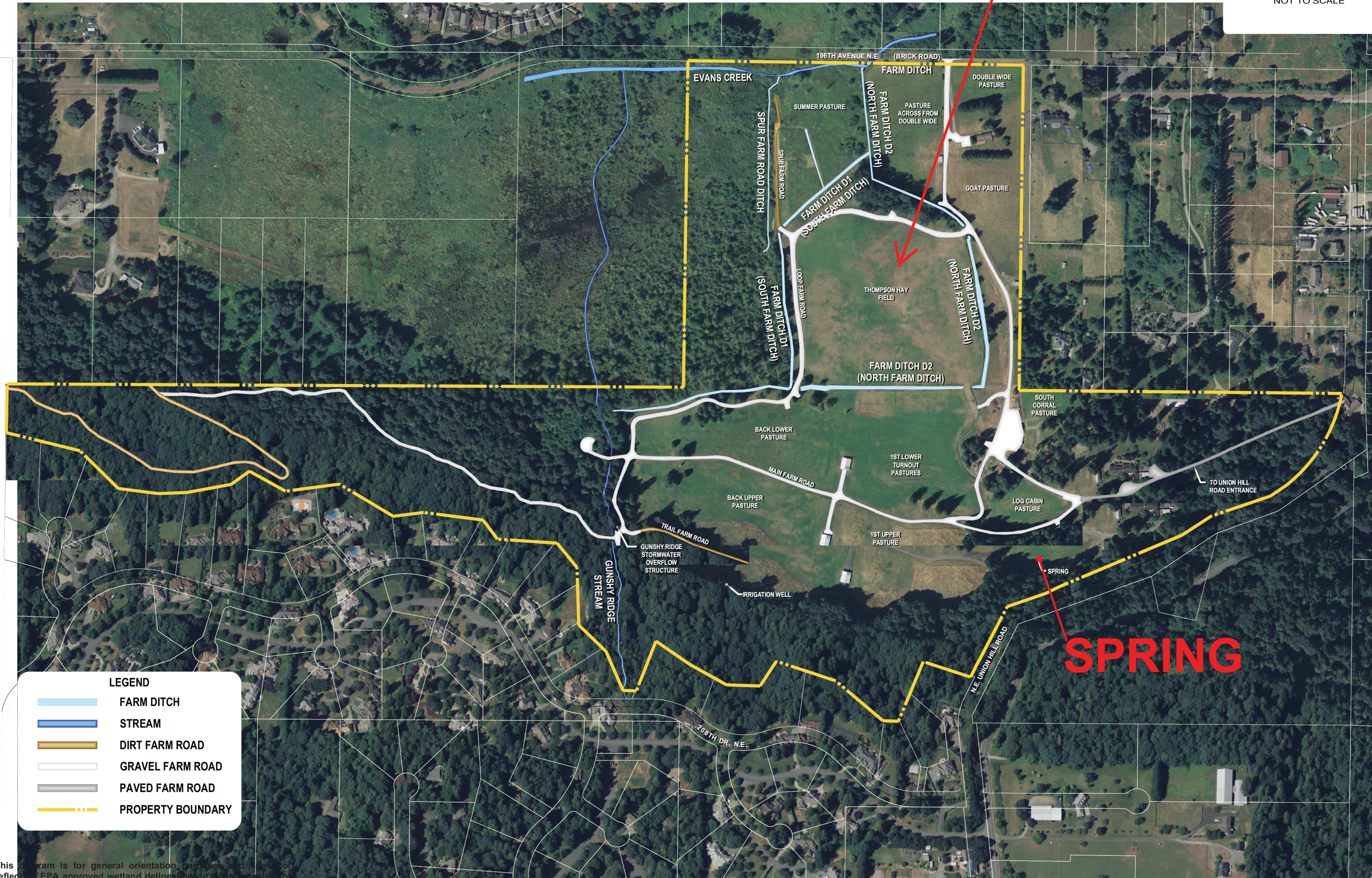


GUNSHY MANOR FARM, EXHIBIT A

THOMPSON FIELD



NOT TO SCALE



LEGEND

FARM DITCH

STREAM

DIRT FARM ROAD

GRAVEL FARM ROAD

PAVED FARM ROAD

PROPERTY BOUNDARY

This diagram is for general orientation purposes and does not reflect an EPA approved wetland delineation or a determination of the geographic extent of Waters of the U.S.

COLOR AERIAL PHOTO: KING COUNTY, 2011

ESM

CONSULTING ENGINEERS LLC  
33400 8th Avenue South, Suite 200  
Federal Way, WA 98003

REVISIONS		
NO	DESCRIPTION/DATE	BY

CONSULTING ENGINEERS LLC

33400 8th Ave S, Suite 205  
Federal Way, WA 98003

FEDERAL WAY  
EVERETT

206.838.4113  
(425) 297-9900

Land Planning  
Landscape Architecture

www.esmcivil.com

Civil Engineering  
Public Works

Land Surveying  
Project Management

ESTATE OF BARBARA J. NESLON

GUNSHY MANOR

GUNSHY MANOR FARM EXHIBIT

KING COUNTY

WASHINGTON

JOB NO.:	1359-001-007
DWG. NAME:	MC-PL-31-KC
DESIGNED BY:	EGL
DRAWN BY:	DCL
CHECKED BY:	
DATE:	11/03/2015
DATE OF PRINT:	



## Buff Nelson

---

**From:** Aaron Young [aarony@amtestlab.com]  
**Sent:** Thursday, March 25, 2010 4:14 PM  
**To:** Buff Nelson  
**Subject:** Gunshy Water AmTest data  
**Attachments:** 10-A003220.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Buff

Here is the drinking water data you requested electronically.

Have a great day!

Aaron Young  
Lab Manager  
AmTest, INC.  
425-885-1664

Am Test Inc.  
13600 NE 126TH PL  
Suite C  
Kirkland, WA 98034  
(425) 885-1664  
www.amtestlab.com



Professional  
Analytical  
Services

### Drinking Water Report for IOC's

System ID No.:		System Name: Gunshy Manor Spring	
Lab/Sample No: 06603220		Date Collected: 02/23/2010	DOH Source No:
Multiple Source Nos.:		Sample Type:	Sample Purpose: N
Date Received: 2/23/10		Date Reported: 3/25/10	Supervisor: AY
Date Digested:		Date Analyzed (Nitrates): 2/23/10	Analyst: MO
County: King		Group: B	
Sample Location: Cistern 20005 NE Union Hill Rd			
Send Report To: Buff Nelson Po Box 461 Redmond, WA 98073		Bill To: Buff Nelson Po Box 461 Redmond, WA 98073	

#### EPA Regulated - IOC's

DOH#	Analytes	Results	Units	SRL	Trigger	MCL	Exceeds	MCL	Method	Analyst
4	Arsenic-GF	ND	mg/l	0.003	0.010	0.050		NO	200.9	HL
5	Barium	ND	mg/l	0.100	2.00	2.00		NO	200.7	HL
6	Cadmium	ND	mg/l	0.0020	0.0050	0.0050		NO	200.7	HL
7	Chromium	ND	mg/l	0.010	0.100	0.100		NO	200.7	HL
11	Mercury	ND	mg/l	0.0005	0.0020	0.0020		NO	245.1	AY
12	Selenium	ND	mg/l	0.005	0.050	0.050		NO	200.9	HL
110	Beryllium	ND	mg/l	0.0030	0.0040	0.0040		NO	200.7	HL
111	Nickel	ND	mg/l	0.040	0.100	0.100		NO	200.7	HL
112	Antimony	ND	mg/l	0.005	0.006	0.006		NO	204.2	HL
113	Thallium	ND	mg/l	0.002	0.002	0.002		NO	279.2	HL
116	Total Cyanide	ND	mg/l	0.050	0.20	0.20		NO	335.4	TS
19	Fluoride	ND	mg/l	0.20	2.0	4.0		NO	SM4500-FE	TS
114	Nitrite	ND	mg/l	0.500	0.500	1.00		NO	SM4500-NO2	MO
20	Nitrate	3.92	mg/l	0.500	5.00	10.0		NO	SM-4500-NO3-F	MO
161	Nitrate + Nitrite	3.9	mg/l	0.50	5.0	10.		NO	353.2	

#### EPA Regulated (Secondary) - IOC's

DOH#	Analytes	Results	Units	SRL	Trigger	MCL	Exceeds	MCL	Method	Analyst
8	Iron	ND	mg/l	0.100	0.300	0.300		NO	200.7	HL
10	Manganese	ND	mg/l	0.0100	0.0500	0.0500		NO	200.7	HL
13	Silver	ND	mg/l	0.01	0.05	0.05		NO	200.7	HL
21	Chloride	ND	mg/l	20.	250	250		NO	300.0	MO
22	Sulfate	15.	mg/l	10.	250	250		NO	300.0	MO
24	Zinc	ND	mg/l	0.200	5.00	5.00		NO	200.7	HL

## State Regulated - IOC's

DOH#	Analytes	Results	Units	SRL	Trigger	MCL	Exceeds	MCL	Method	Analyst
14	Sodium	6.2	mg/l	5.0					200.7	HL
15	Hardness (CaCO3)	83.	mg/l	10.					200.7 calc	HL
16	Conductivity	210	umhos/cm	10.	700	700		NO	120.1	SS
17	Turbidity	0.16	NTU	0.10	1.0	1.0		NO	2130B	SS
18	Color	ND	unit	5.	15.	15.		NO	110.2	SS

## State Unregulated - IOC's

DOH#	Analytes	Results	Units	SRL	Trigger	MCL	Exceeds	MCL	Method	Analyst
9	Lead-GF	ND	mg/l	0.002	0.015	0.015		NO	200.9	HL
23	Copper	ND	mg/l	0.200	1.30	1.30		NO	200.7	HL

## Other - IOC's

DOH#	Analytes	Results	Units	SRL	Trigger	MCL	Exceeds	MCL	Method	Analyst
409	pH	6.74	unit						150.1	SS
402	Aluminum	ND	mg/l	0.05					200.7	HL
405	Calcium	15.	mg/l	0.50					200.7	HL
404	Magnesium	11.	mg/l	0.10					200.7	HL

## NOTES:

**SRL (State Reporting Level):** indicates the minimum reporting level required by the Washington Department of Health (DOH)

**Trigger Level:** DOH Drinking Water response level. Systems with compounds detected at concentrations in excess of this level are required to take additional samples. Contact your regional DOH office for further information.

**MCL (Maximum Contaminant Level):** If the contaminant amount exceeds the MCL, immediately contact your regional DOH office.

**NA (Not Analyzed):** in the results column indicates this compound was not included in the current analysis.

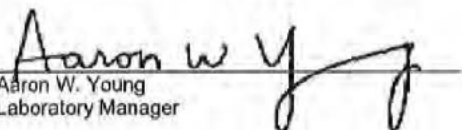
**ND (Not Detected):** in the results column indicates this compound was analyzed and not detected at a level greater than or equal to the SRL.

**<(0.001):** indicates the compound was not detected in the sample at or above the concentration indicated.

HARDNESS		
GRAINS/GAL	mg/L (ppm)	RESULT
0 to 1	0 to 17.1	SOFT
1 to 3.5	17.1 to 60	SLIGHTLY HARD
3.5 to 7.0	60 to 120	MODERATELY HARD
7.0 to 10.5	120 to 180	HARD
>10	> 180	VERY HARD

\*NOTE: To convert grains/gal to ppm, multiply grains times 17.1

To convert ppm to grains/gal, divide ppm by 17.1.

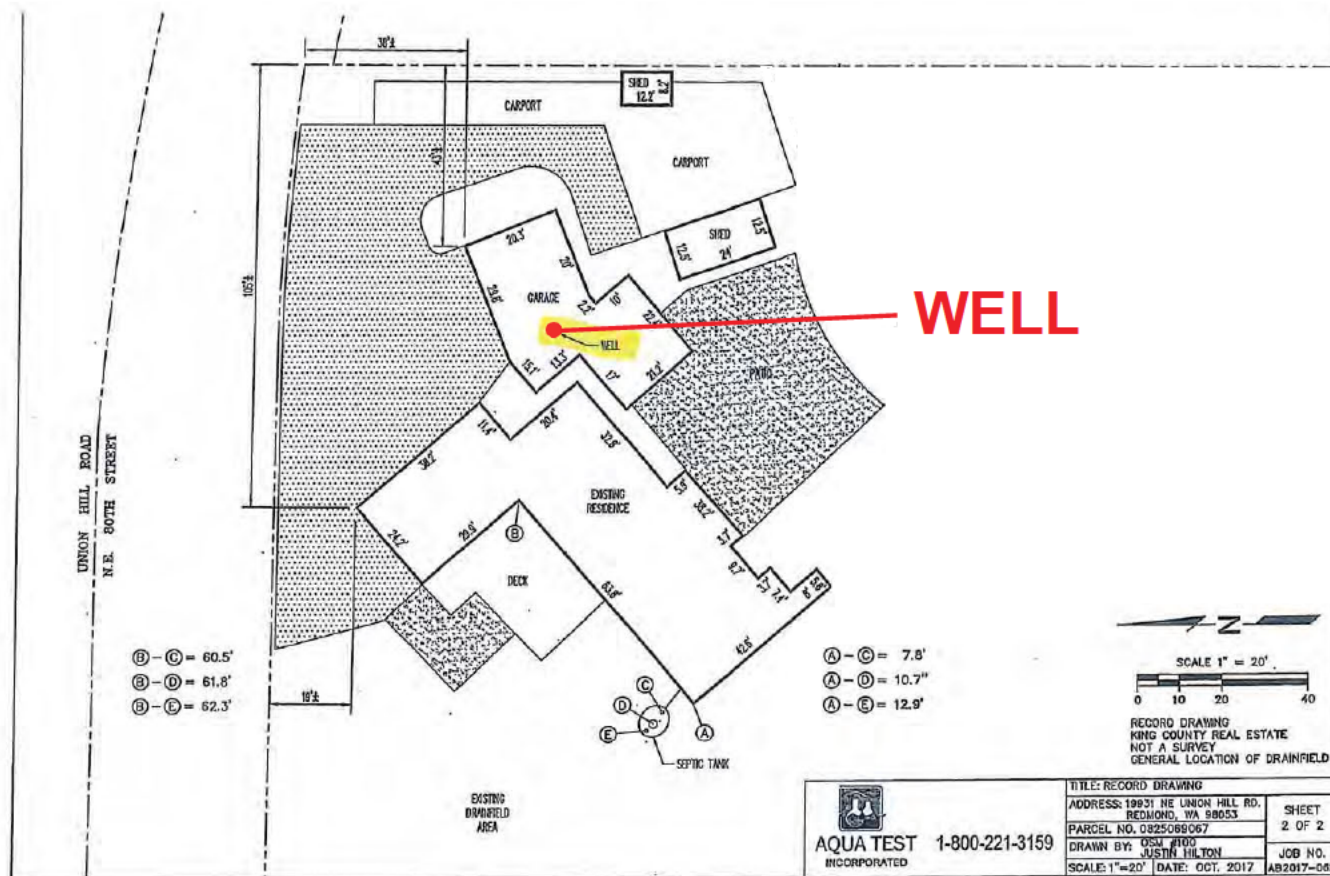
  
 Aaron W. Young  
 Laboratory Manager



## **Ex. 7**

### **Evans Parcel Well Map and Test Results**

# EVANS PARCEL





CUSTOMER: Buff Nelson  
16508 NE 79th St.  
Redmond, WA 98052

Date: 01/19/18

**Lab Sample Collected By Aqua Test**

**COLLECTION DATE:** 10/27/17

**RECEIVED TO LAB:** 10/27/17

**SAMPLE ID:** 19931 NE Union Hill Rd  
Redmond, WA 98052

ANALYSIS	RESULTS
Presence/ Absence Coliform	Absent*
Total Coliform	Absent*
Fecal Coliform	Absent*
E. Coli	Absent*
Nitrate (mg/L or ppm)	0.5*

\*Results comply with EPA standards for these parameters.

Sample was analyzed in accordance with  
Standard Methods for the Examination of Water & Wastewater,  
22nd Edition, 2012.

PREPARED BY: King Rick

## **Ex. 8**

### **Industrial Sites Map**



